

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

RICHARD C. HUNT,)	
)	
Plaintiff,)	C.A. No. 04-1417 ***
)	
v.)	
)	
FIRST CORRECTIONAL MEDICAL)	JURY OF 12 DEMANDED
SERVICES, et al.)	
)	
Defendants.)	

**REQUEST FOR PRODUCTION DIRECTED TO PLAINTIFF
BY DEFENDANT FIRST CORRECTIONAL MEDICAL**

The defendant requests the plaintiff to produce for examination and copying at the office of the attorney for defendant on or before thirty (30) days from receipt of this Request:

1. All documents referred to in Plaintiff's Answers to Interrogatories filed simultaneously hereto.
2. Copies of all documents which are relevant, in whole or in part, to plaintiff's claims for medical malpractice, Eighth Amendment violations and deliberate indifference.
3. Copies of all documents which are relevant, in whole or in part, to plaintiff's claims of special and general damages (including future lost wages claimed).
4. Please produce your Federal and State income tax returns for the years 1996 through the present.
5. Copies of all bills and receipts evidencing payment of bills for which the plaintiffs seek compensation in this lawsuit.
6. Copies of the curriculum vitae and reports of all experts you intend to call at trial.

MCCULLOUGH & MCKENTY, P.A.

/s/ Dana Spring Monzo

Daniel L. McKenty, Del. Bar No. 2689

Dana Spring Monzo, Del Bar No. 4605

1225 N. King Street, Suite 1100

P.O. Box 397

Wilmington, DE 19899-0397

(302) 655-6749

Attorney for Defendant First Correctional
Medical

May 7, 2007

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DISTRICT OF DELAWARE**

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Plaintiff,)	C.A. No. 04-1417 ***
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FIRST CORRECTIONAL MEDICAL)	JURY OF 12 DEMANDED
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Defendants.)	

CERTIFICATE OF SERVICE

I certify that, on this date, one copy of the attached *Request for Production Directed to Plaintiff by Defendant First Correctional Medical* was served on the following individual:

Via First Class Mail
Richard C. Hunt
SBI# 274714
Delaware Correctional Center
1181 Paddock Rd.
Smyrna, DE 19977

Via Electronic Service
Eileen Kelly, Esquire
Department of Justice
820 N. French St., 6th Fl.
Wilmington, DE 19801

/s/ Dana Spring Monzo
Dana Spring Monzo, Del Bar No. 4605

May 7, 2007